

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Mark J. Politan, Esq.
POLITAN LAW, LLC
88 East Main Street, #502
Mendham, New Jersey 07945
(973) 768-6072
mpolitan@politanlaw.com

-and

Robert J. Tolchin, Esq.
THE BERKMAN LAW OFFICE, LLC
111 Livingston Street, Suite 1928
Brooklyn, New York 11201
(718) 855-3627
rtolchin@berkmanlaw.com

*Attorneys for Diana Campuzano, Avi Elishis, and
Gregg Salzman*

In Re:

AMERICAN CENTER FOR CIVIL JUSTICE,
INC.

Debtor-in Possession.

Case No.: 18-15691 (CMG)
Chapter: 11
Judge: Christine M. Gravelle

Hearing Date and Time:
May 29, 2018 at 10:00 a.m.

**NOTICE OF MOTION OF DIANA CAMPUZANO, AVI ELISHIS, AND GREGG
SALZMAN FOR APPOINTMENT OF A CHAPTER 11 TRUSTEE PURSUANT TO
11 U.S.C. § 1104(a) AND FED R. BANKR. P. 2007.1**

TO: ALL PARTIES IN INTEREST

PLEASE TAKE NOTICE that on the **29th day of May, 2018 at 10:00 a.m.** (Eastern Time), or as soon thereafter as counsel may be heard, the undersigned, attorneys to Diana Campuzano, Avi Elishis and Gregg Salzman, will move before the Honorable Christine M. Gravelle, United States Bankruptcy Judge, at the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608, Courtroom 3, for entry of an Order appointing a chapter 11 trustee pursuant to 11 U.S.C. § 1104(a) and Fed R. Bankr. P. 2007.1 (the “Motion”).

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely on the Application in Support of Motion (the “Application”) and the Certification of Robert J. Tolchin, Esq. (the “Tolchin Cert.”), which sets forth the relevant factual and legal basis upon which the relief requested should be granted.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing, (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court in accordance D.N.J. LBR 9013-2, so as to be received no later than seven (7) days before the hearing date set forth above.

PLEASE TAKE FURTHER NOTICE that a proposed order incorporating the relief sought is submitted herewith.

PLEASE TAKE FURTHER NOTICE that unless objections are timely presented, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-3 and the requested relief may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument on the return date of the Motion if objections are timely presented.

Dated: May 8, 2018

Respectfully submitted,

POLITAN LAW, LLC

Mark J. Politan, Esq.

502 East State Street, #502

Mendham, New Jersey 07945

Telephone: (212) 407-7700

Email: mpolitan@politanlaw.com

-and-

THE BERKMAN LAW OFFICE, LLC

By: /s/ Robert J. Tolchin

Robert J. Tolchin

111 Livingston Street, Suite 1928

Brooklyn, New York 11201

(718) 855-3627

rtolchin@berkmanlaw.com

*Counsel to Diana Campuzano, Avi Elishis
and Gregg Salzman*